REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 12, 13, and 23 are amended. New claims 51 and 52 are added. Claims 1-49 and 51-52 are pending in this application.

Allowable Subject Matter

Claims 47 and 48 stand allowed.

In the December 18 Final Office Action, claim 13 was objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. As part of this amendment, claim 13 has been rewritten to include all of the elements of its base claim (claim 12). Thus, Applicant respectfully submits that claim 13 is in condition for allowance.

35 U.S.C. § 102

Claims 1, 3, 10-12, 14, 23, 27-33, 36, 39-42, and 44-46 stand rejected under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent No. 6,173,287 to Eberman et al. (hereinafter "Eberman"). Applicant respectfully submits that claims 1, 3, 10-12, 14, 23, 27-33, 36, 39-42, and 44-46 are not anticipated by Eberman.

With respect to claim 1, in the December 18 Final Office Action it was asserted that "Eberman's GUI as shown on fig. 12 still reads on the limitations in that the GUI: provides users with annotation identifiers (such as "history"); users are able to select an annotation from the five annotations listed; and the

annotations are rendered after users select one of the five annotation choices."
See, December 18 Final Office Action at ¶ 11, pp. 12-13.

Applicants respectfully disagree and submit that Eberman does not disclose or suggest the system of claim 1. As shown in Eberman in Fig. 12, and discussed in Eberman at col. 22, lines 23-67, Fig. 12 shows "an exemplary HTML results page 190 for a query which included the terms 'commission' and history'" (see, col. 22, lines 23-25). Applicant respectfully submits, however, that nowhere does Fig. 12 show a graphical user interface that enables a user to request selected ones of the plurality of annotations, based on the plurality of annotation identifiers, and **to render the requested annotations** as recited in claim 1. If the term "history" in results page 190 is an annotation identifier as claimed in claim 1, then the remaining language of claim 1 is not satisfied by Eberman because there is no ability in Eberman to enable a user to request selected ones of the plurality of annotations based on the "history" identifier and **render these requested annotations**.

Applicant notes that results page 190 of Eberman includes "a textual excerpt from the corresponding video stream" for video matches (see, col. 22, lines 28-36). However, Applicant respectfully submits that this is part of the video stream (part of the "multimedia content" using the language of claim 1), not an annotation. As Fig. 12 does not **render the requested annotations**, Applicant respectfully submits that Fig. 12 cannot disclose or suggest the system of claim 1.

If this rejection of claim 1 is maintained, Applicant respectfully requests that the Examiner specifically identify where in Fig. 12 the requested annotations are rendered.

For at least these reasons, Applicant respectfully submits that claim 1 is allowable over Eberman.

With respect to claim 3, in the December 18 Final Office Action it was asserted that Eberman, at Figures 8-10 and col. 16, lines 11-67 teaches the graphical user interface of claim 3. See, December 18 Final Office Action at ¶ 5, pp. 3-4. Applicant respectfully disagrees with this assertion.

Claim 3 recites (emphasis added), in part, "an annotation type selector presenting a plurality of annotation media types, whereupon selection of one of the plurality of annotation types **causes the network client to change presentation of the annotation content field based on the selected annotation type**". Applicant respectfully submits that Eberman does not disclose or suggest such a dynamic graphical user interface where the presentation of the annotation content field type is changed based on the selected annotation type as claimed in claim 3.

The cited portions of Eberman discuss an object table in which all the objects in the object database of Eberman are listed (see, col. 16, lines 11-13), a representation table in which all of the representations in the object database are listed (see, col. 16, lines 30-32), and an annotation table in which all of the annotations in the object data are listed (see, col. 16, lines 65-67). Eberman also discloses that "Each of the annotations in the object database of the meta database 26 are also assigned an annotation type 154. The annotation type 154 can be, for example, transcript, speaker, or keyframe." See, col. 17, lines 17-20.

Nowhere, however, does Eberman make any mention of a dynamic portion of a graphical user interface that changes based on a selected annotation type. Applicant respectfully submits that the mere disclosure of annotations or

annotation types does not disclose or suggest a dynamic graphical user interface where the presentation of the annotation content field type is changed based on the selected annotation type as claimed in claim 3.

For at least these reasons, Applicant respectfully submits that claim 3 is allowable over Eberman.

With respect to claims 10 and 11, claims 10 and 11 depend from claim 3, and Applicant thus respectfully submits that claims 10 and 11 are allowable over Eberman for at least the reasons discussed above with respect to claim 3.

With respect to claim 12, in the December 18 Final Office Action it was asserted that ". . . the claim language merely requires for an annotation set selector via which a user can identify one or more of a plurality of annotation sets to be searched. Eberman meets the claim limitation since Eberman provides a means for an user to request/query the system to select annotation sets from the database matching the search criteria (fig. 12; *annotation sets of "commission" and "history"*)." See, December 18 Final Office Action at ¶ 11, pp. 12-13. Applicant respectfully disagrees and submits that Eberman does not disclose or suggest the graphical user interface of claim 12.

If, as suggested in the December 18 Final Office Action, the user is able to query the system to select annotation sets from the database matching the search criteria, then all of the claim language of amended claim 12 is not satisfied by Eberman. As claimed in amended claim 12, "actuation of the query button causes the network client to forward identifiers of the identified one or more annotation sets and the identified search criteria to an annotation server to search the annotation database". Thus, in amended claim 12, **both identifiers of the**

identified one or more annotation sets and the identified search criteria are forwarded to the annotation server. There are no two such elements (annotation set identifiers and search criteria) forwarded to an annotation server in Eberman; rather, Eberman only discusses search criteria.

For at least these reasons, Applicant respectfully submits that amended claim 12 is allowable over Eberman.

With respect to claim 14, claim 14 depends from claim 12, and Applicant thus respectfully submits that claim 14 is allowable over Eberman for at least the reasons discussed above with respect to claim 12.

With respect to amended claim 23, Applicant respectfully submits that Eberman does not disclose or suggest "an annotation identifier portion that identifies a plurality of annotations corresponding to the video content, wherein the annotation identifier portion identifies each of the plurality of annotations by an annotation subject line" as claimed in amended claim 23.

In the December 18 Final Office Action it was asserted, with respect to claim 49, that "although Eberman does not explicitly disclose each annotation identifier of the plurality of annotation identifiers to comprise an annotation subject line of an annotation corresponding to the multimedia content, it would have been obvious to an artisan at the time of the invention that some sort of subject line must be created-as/associated-with annotation identifiers in order to describe what the annotation is about." See, December 18 Final Office Action at ¶ 6, pp. 9-10. Applicant respectfully disagrees with this assertion.

Applicant respectfully submits that there is no disclosure or suggestion in Eberman for a graphical user interface that includes an annotation identifier

portion that identifies each of the plurality of annotations by an annotation subject line as recited in amended claim 23. The annotation values in Eberman are very short, such as a word, a speaker's name, or an URL (see, Fig. 10 and col. 17, lines 26-30). Given the short nature of these annotation values, Applicant respectfully submits that it would not have been obvious to include an annotation subject line as claimed in amended claim 23. If, for example, the annotation value in Eberman is the speaker's name, Applicant respectfully submits there would not be a need for any subject line, and thus including an annotation subject line would not have been obvious.

For at least these reasons, Applicant respectfully submits that claim 23 is allowable over Eberman.

With respect to claim 27, claim 27 depends from claim 23, and Applicant thus respectfully submits that claim 27 is allowable over Eberman for at least the reasons discussed above with respect to claim 23.

With respect to claim 28, Applicant respectfully submits that Eberman does not disclose or suggest forwarding information for the new annotation to an annotation server, **the information including data associated with the user interface** as claimed in claim 28.

Eberman discloses that "Annotations are generated for an object so as to provide information about the whole object or a part of the object. Annotations may be generated for an object by trusted automatic processes called annotation daemons, such as the annotation client 18, or by trusted human annotators. Annotations which have previously been generated for an object, including both

annotations produced by annotation daemons or by human annotators, may be reviewed and updated." See, col. 15, lines 4-11.

Applicant respectfully submits, however, that nothing in this discussion of Eberman, or elsewhere in Eberman, discloses or suggests a method that includes forwarding information for the new annotation to an annotation server, **the information including data associated with the user interface** as claimed in claim 28. Merely disclosing that annotations may be generated by a trusted human annotator or an annotation daemon does not provide any suggestion for forwarding information for a new annotation to an annotation server, **the information including data associated with the user interface**. Applicant respectfully submits that there is no such user interface disclosed in Eberman, much less any data associated with a user interface that is forwarded as at least part of the information for a new annotation to an annotation server.

For at least these reasons, Applicant respectfully submits that claim 28 is allowable over Eberman.

With respect to claims 29-31, claims 29-31 depend from claim 28, and Applicant thus respectfully submits that claims 29-31 are allowable over Eberman for at least the reasons discussed above with respect to claim 28.

With respect to claim 32, Applicant respectfully submits that Eberman does not disclose or suggest analyzing at least a portion of media content to identify a likely temporal location of the media content to associate a new annotation with, and presenting the likely temporal location to the user via a user interface as claimed in claim 32.

In the December 18 Final Office Action, it was asserted that ". . . by disclosing that "Annotations may be generated...by trusted human annotators" as well as previously generated annotations may be reviewed and updated by human annotators (col. 15, lines 5-11) in accordance to the data structure as defined on figures 8-10, an user interface comprising various fields and/or controls would have been inherent in Eberman's system in order to allow users a an interface means for creating (generating/populating) annotations and their associated information, such as annotation contents and types, as defined in the tables of figs. 8-10." See, December 18 Final Office Action at ¶ 11, pp. 12-13.

Applicant respectfully submits that there is no disclosure or suggestion in Eberman of identifying a likely temporal location to associate a new annotation with and presenting that likely temporal location to the user via a user interface. Merely disclosing that annotations may be generated by trusted human annotators does not disclose or suggest any such identifying and presenting. Assuming for the sake of argument that an interface means for creating (generating/populating) annotations and their associated information as asserted in the December 18 Final Office Action with reference to claim 32 is inherent in Eberman, there is still nothing in Eberman that discloses or suggests including in this inherent interface identifying a likely temporal location to associate a new annotation with and presenting that likely temporal location to the user.

For at least these reasons, Applicant respectfully submits that claim 32 is allowable over Eberman.

With respect to claims 33, 36 and 39-41, claims 33, 36 and 39-41 depend from claim 32, and Applicant thus respectfully submits that claims 33, 36 and 39-

41 are allowable over Eberman for at least the reasons discussed above with respect to claim 32.

With respect to claim 42, Applicant respectfully submits that Eberman does not disclose or suggest presenting, to the user via the graphical user interface, a plurality of likely temporal locations of the media content to associate the new annotation with; and receiving a user selection of one of the plurality of likely temporal locations to be the temporal location of the media content to associate the new annotation with as claimed in claim 42.

In the December 18 Final Office Action, it was asserted that "Claim 42 is similar in scope to claim 32, and would have been therefore rejected under similar rationale. Eberman further teaches the presenting of a plurality of likely temporal locations of the media content to associate the new annotation with (figs. 12-13; col. 15, lines 4-11)". See, December 18 Final Office Action at ¶ 5, p. 5. Applicant respectfully disagrees with this assertion.

Applicant respectfully submits that nowhere does Eberman disclose or suggest presenting, to the user via the graphical user interface, a plurality of likely temporal locations of the media content to associate the new annotation with, much less of receiving a user selection of one of the plurality of likely temporal locations to be the temporal location of the media content to associate the new annotation with as claimed in claim 42.

Eberman discloses that "The user 11 enters a query through the HTML query page and the browser client 20 sends a message, including the query, to the index database server 32 for processing by the index database server 32. In response, the index database server 32 searches the index database 30 for

annotation values which match the query." (see, col. 21, lines 10-15). "The index database server uses the information provided by the librarian 28 to build an HTML results page for presentation to the user 11." (see, col. 22, lines 9-11). Fig. 12 shows an exemplary HTML results page 190 (see, col. 22, lines 23-25).

Thus, Fig. 12 shows an exemplary HTML results page that results from a user-entered query and a search for annotation values which match the query. Nowhere in this search process is there any disclosure or suggestion of presenting, to the user via the graphical user interface, a plurality of likely temporal locations of the media content to associate the new annotation with as claimed in claim 42. Fig. 12 shows results from a search where annotation values in the index database were searched for matches to the query, not likely temporally locations of the media content **to associate a new annotation with**. In fact, there is nothing in Fig. 12 that discloses or suggests a new annotation to be associated with media content, much less of presenting a plurality of likely temporal locations of the media content to associate the new annotation with.

With regard to Fig. 13, Fig. 13 shows "an exemplary HTML matches page 210 for allowing the user 11 to browse each location within the video stream associated with the third match presented in the HTML results page 190 where a match has occurred." (see, col. 23, lines 5-9). Fig. 13 shows the page that is the result when "it is assumed that the user 11 has selected the 'matches' option 198 associated with the third match presented in the HTML results page 190" (see, col. 23, lines 1-4). Thus, Fig. 13 shows additional information stemming from the results page of Fig. 12, not presenting, to the user via the graphical user interface,

a plurality of likely temporal locations of the media content to associate the new annotation with as claimed in claim 42.

With regard to the cited text of Eberman, "col. 15, lines 4-11", this cited portion reads "Annotations are generated for an object so as to provide information about the whole object or a part of the object. Annotations may be generated for an object by trusted automatic processes called annotation daemons, such as the annotation client 18, or by trusted human annotators. Annotations which have previously been generated for an object, including both annotations produced by annotation daemons or by human annotators, may be reviewed and updated."

Applicant respectfully submits, however, that there is nothing in this generation of annotations described in Eberman, whether by annotation daemons or trusted human annotators, of presenting, to the user via a graphical user interface, a plurality of likely temporal locations of the media content to associate a new annotation with as claimed in claim 42, much less of receiving a user selection of one of the plurality of likely temporal locations to be the temporal location of the media content to associate the new annotation with as claimed in claim 42. Applicant respectfully submits that merely disclosing that annotations may be generated by trusted human annotators does not provide any disclosure or suggestion of presenting, to the user via the graphical user interface, a plurality of likely temporal locations of the media content to associate the new annotation with as claimed in claim 42, much less of receiving a user selection of one of the plurality of likely temporal locations to be the temporal location of the media content to associate the new annotation with as claimed in claim 42.

For at least these reasons, Applicant respectfully submits that claim 42 is allowable over Eberman.

With respect to claims 44-46, claims 44-46 depend from claim 42, and Applicant thus respectfully submits that claims 44-46 are allowable over Eberman for at least the reasons discussed above with respect to claim 42.

Applicant respectfully requests that the §102 rejections be withdrawn.

35 U.S.C. § 103

Claims 4-6, 8, 14-22, 24, 26, 34-35, 37-38, and 49-50 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eberman. Applicant respectfully submits that claims 4-6, 8, 14-22, 24, 26, 34-35, 37-38, and 49 are not obvious over Eberman.

With respect to claim 16, Applicant respectfully submits that Eberman does not disclose or suggest a graphical user interface comprising an annotation identifier list via which an identifier for each of a plurality of annotations corresponding to the media content is displayed, the identifier including an indication of a type of content included in the annotation as recited in claim 16.

In the December 18 Final Office Action, it was asserted that Eberman at Figure 12 and col. 22, lines 23-46 teaches the graphical user interface of claim 16 (see, December 18 Final Office Action at ¶ 6, p. 7). Applicant respectfully disagrees with this assertion.

As discussed above, Fig. 12 of Eberman shows an exemplary HTML results page that results from a user-entered query and a search for annotation values which match the query. This results page includes a video icon 194 or an

audio icon 196 depending upon the type of object that is associated with each matching annotation value (see, col. 22, lines 29-31). If the user selects either a video icon 194 or an audio icon 196, then the video or audio stream will play from the location of the first match within the corresponding video or audio stream (see, col. 22, lines 47-50). Thus, the video and audio icons shown and discussed with reference to Fig. 12 of Eberman are for the corresponding video or audio stream, **not for the annotation**. These icons identify whether the corresponding stream is a video stream or an audio stream, **not the type of content included in an annotation** as recited in claim 16. Thus, Applicant respectfully submits that Eberman does not disclose or suggest a graphical user interface comprising an annotation identifier list via which an identifier for each of a plurality of annotations corresponding to the media content is displayed, **the identifier including an indication of a type of content included in the annotation** as recited in claim 16

For at least these reasons, Applicant respectfully submits that claim 16 is allowable over Eberman.

With respect to claims 4-6, 8, 14-15, 17-22, 24, 26, 34-35, 37-38, and 49, claims 4-6 and 8 depend from claim 3, claims 14 and 15 depend from claim 12, claims 17-22 depend from claim 16, claims 24 and 26 depend from claim 23, claims 34-35 and 37-38 depend from claim 32, and claim 49 depends from claim 1. Applicant respectfully submits that each of claims 4-6, 8, 14-15, 17-22, 24, 26, 34-35, 37-38, and 49 is allowable over Eberman for at least the reasons discussed above regarding the respective independent claims from which they depend.

Claims 2 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eberman in view of U.S. Patent No. 4,649,499 to Sutton et al. (hereinafter "Sutton"). Applicant respectfully submits that claims 2 and 25 are not obvious over Eberman in view of Sutton.

With respect to claim 2, claim 2 depends from claim 1 and Applicant respectfully submits that claim 2 is allowable over Eberman for at least the reasons discussed above with respect to claim 1. Sutton is not cited as curing, and Applicant respectfully submits that Sutton does not cure, the deficiencies of Eberman discussed above with respect to claim 1. For at least these reasons, Applicant respectfully submits that claim 1 is allowable over Eberman in view of Sutton, and thus claim 2 is allowable over Eberman in view of Sutton at least because of its dependency on claim 1.

With respect to claim 25, claim 25 depends from claim 23 and Applicant respectfully submits that claim 25 is allowable over Eberman for at least the reasons discussed above with respect to claim 23. Sutton is not cited as curing, and Applicant respectfully submits that Sutton does not cure, the deficiencies of Eberman discussed above with respect to claim 23. For at least these reasons, Applicant respectfully submits that claim 23 is allowable over Eberman in view of Sutton, and thus claim 25 is allowable over Eberman in view of Sutton at least because of its dependency on claim 23.

Claims 7 and 43 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eberman in view of U.S. Patent No. 5,600,775 to King et al. (hereinafter "King"). Applicant respectfully submits that claims 7 and 43 are not obvious over Eberman in view of King.

With respect to claim 7, claim 7 depends from claim 3 and Applicant respectfully submits that claim 7 is allowable over Eberman for at least the reasons discussed above with respect to claim 3. King is not cited as curing, and Applicant respectfully submits that King does not cure, the deficiencies of Eberman discussed above with respect to claim 3. For at least these reasons, Applicant respectfully submits that claim 3 is allowable over Eberman in view of King, and thus claim 7 is allowable over Eberman in view of King at least because of its dependency on claim 3.

With respect to claim 43, claim 43 depends from claim 42 and Applicant respectfully submits that claim 43 is allowable over Eberman for at least the reasons discussed above with respect to claim 42. King is not cited as curing, and Applicant respectfully submits that King does not cure, the deficiencies of Eberman discussed above with respect to claim 42. For at least these reasons, Applicant respectfully submits that claim 42 is allowable over Eberman in view of King, and thus claim 43 is allowable over Eberman in view of King at least because of its dependency on claim 42.

Claim 9 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Eberman in view of U.S. Patent No. 5,838,313 to Hou et al. (hereinafter "Hou"). Applicant respectfully submits that claim 9 is not obvious over Eberman in view of Hou.

With respect to claim 9, claim 9 depends from claim 3 and Applicant respectfully submits that claim 9 is allowable over Eberman for at least the reasons discussed above with respect to claim 3. Hou is not cited as curing, and Applicant respectfully submits that Hou does not cure, the deficiencies of Eberman discussed

above with respect to claim 3. For at least these reasons, Applicant respectfully submits that claim 3 is allowable over Eberman in view of Hou, and thus claim 9 is allowable over Eberman in view of Hou at least because of its dependency on claim 3.

Applicant respectfully requests that the §103 rejections be withdrawn.

New Claims

New claims 51 and 52 are added to the subject application.

With respect to new claim 51, Applicant respectfully submits that the cited references do not disclose or suggest one or more computer readable media having stored thereon a plurality of instructions that, when executed by a processor, causes the processor to present a plurality of annotation identifiers corresponding to multimedia content that enable a user to request selected ones of the plurality of annotations, based on the plurality of annotation identifiers, and to render the requested annotations as claimed in new claim 51. For at least these reasons, Applicant respectfully submits that new claim 51 is allowable over the cited references.

With respect to new claim 52, new claim 52 depends from claim 3 and Applicant respectfully submits that new claim 52 is allowable over the cited references due to its dependency on claim 3. Furthermore, Applicant respectfully submits that the cited references do not disclose or suggest a graphical user interface as recited in claim 3, further comprising an input option that allows the user adding the new annotation to remain anonymous as claimed in new claim 52.

For at least these reasons, Applicant respectfully submits that new claim 52 is allowable over the cited references.
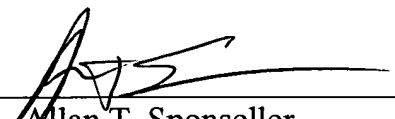
Conclusion

Claims 1-49 and 51-52 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

Date: __April 18, 2003__   By: _____

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12.   (Amended) A graphical user interface at a network client to search for annotations corresponding to media content in an annotation database, the graphical user interface comprising:

an annotation set selector via which a user can identify one or more of a plurality of annotation sets to be searched;

a search criteria portion via which a user can identify search criteria; and

a query button, wherein actuation of the query button causes the network client to forward <u>identifiers of</u> the identified one or more annotation sets and the identified search criteria to an annotation server to search the annotation database.

13.   (Amended) A graphical user interface [as recited in claim 12, further comprising] at a network client to search for annotations corresponding to media content in an annotation database, the graphical user interface comprising:

<u>an annotation set selector via which a user can identify one or more of a plurality of annotation sets to be searched;</u>

<u>a search criteria portion via which a user can identify search criteria;</u>

a target check box, whereupon selection of the target check box causes the network client to add, as an additional search criteria, a media content identifier; and

<u>a query button, wherein actuation of the query button causes the network client to forward the identified one or more annotation sets and the identified search criteria to an annotation server to search the annotation database.</u>

23. (Amended) A graphical user interface presented by an interface module, the graphical user interface comprising:

an annotation content portion via which annotations corresponding to [the] video content are presented to a user;

an annotation identifier portion that identifies a plurality of annotations corresponding to the [media portion] video content, wherein the annotation identifier portion identifies each of the plurality of annotations by an annotation subject line; and

an input button, wherein user selection of the input button causes the interface module to create a new annotation.